

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 2-19 are pending, Claim 1 having been canceled without prejudice or disclaimer, Claims 2-10, 14-15 and 17 having been amended and Claims 18 and 19 added by way of the present amendment. Support for the amendments in Claims 18 and 19 are found in the specification and therefore no new matter is added. At least with respect to Claims 18 and 19, support is found in at least Figures 4 and 5.

In the outstanding Office Action Claims 7 and 15 were rejected under 35 U.S.C. §112, second paragraph; and Claims 1-17 were rejected as being unpatentable over Takeuchi (U.S. Patent No. 6,738,562).

In reply Claims 7 and 15 have been amended consistent with 35 U.S.C. §112, second paragraph.

The independent claims have been amended because it appears as though the novel features in the presently claimed invention have not been fully appreciated in the outstanding Office Action. Thus, Claim 1 has been canceled and rewritten as Claim 18. Claim 18, includes, among other things, a database in which a first file ID identifying a first file for storing a predetermined content in a first format, and a second file ID identifying a second file for storing a the predetermined content in a second format. The first file ID and the second file ID are associated with one content ID that identifies the predetermined content. The apparatus includes a content ID specifying unit that is configured to specify one of the content IDs when the content is selected from a content list. A selecting unit is configured to select either the first file or the second file based on the first file ID and the second file ID when the specified content ID is associated with the first and second file ID.

In a non-limiting example, Figures 4 and 5 of the present specification describe an example embodiment. As seen, in Figure 4, a particular content, such as Song-A, which has a song ID 1, is stored in two different formats in a file table. Moreover, file ID 101 and file ID 102 are associated with the song ID 1. The file ID 101 is associated with a particular file saved in an MP3 format. Similarly, file ID 102 is saved in an OpenMG format. However both file IDs (101 and 102) are associated with song ID1 in the song table.

As explained in the present specification, an advantage with this approach is that it solves a problem of conventional devices that are cumbersome when changing one file from one format or encoding system to another (see, e.g., specification page 1, for example).

Takeuchi is directed to an optical disc playback apparatus that is configured to play back various formatted content, such as video CD, karaoke CD, or DVD (column 4, lines 48-49), for example. Takeuchi provides a way for displaying character display lines on a screen without shifting regardless of whether an NTSC format is used or a PAL format is used.

Comparing Claim 18 to Takeuchi, it is respectfully submitted that Takeuchi does not address a number of features of the presently claimed invention, and is directed to a completely different apparatus. Claim 18 for example is directed to an apparatus for storing a content ID, and first and second file IDs which respectively correspond to a first file for storing the content in a first format, and a second file for storing the content in a second format. The apparatus also allows for specifying one of the content IDs, and then selecting either the first file or the second file based on the first file ID and the second file ID acquired from the database. Takeuchi on the other hand does not store first file IDs and second file IDs for different formats, both corresponding to one content and one content ID. Therefore, it is respectfully submitted that Takeuchi neither anticipates, nor renders obvious the invention defined by Claim 18.

Although of differing scope, and/or statutory class, it is respectfully submitted that Claims 2-17 and new dependent Claim 19 also patentably define over Takeuchi for substantially the same reasons discussed above with regard to Claim 18.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 2-19, as amended, is definite and patentably distinguishing over the prior art. The present application is therefore believed to be in condition for formal allowance.

Respectfully submitted,

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